

July 23, 2020

By ECF

Honorable Lewis J. Liman,
Daniel Patrick Moynihan United States Courthouse,
500 Pearl Street,
New York, New York 10007-1312.

Re: *Shak v. JPMorgan Chase & Co.*, No. 15-cv-992 (S.D.N.Y.);
Wacker v. JPMorgan Chase & Co., No. 15-cv-994 (S.D.N.Y.);
Grumet v. JPMorgan Chase & Co., No. 15-cv-995 (S.D.N.Y.).

Dear Judge Liman:

On behalf of all parties in the above-captioned actions (the “Actions”), we write pursuant to this Court’s June 23, 2020 order (the “Order”), *see* ECF No. 277, which extended the current stay of proceedings in the Actions until July 30, 2020 and instructed the parties to inform the Court of their view on the need for a continued stay on July 23, 2020.

Since the Court’s Order, the parties have reached settlements in principle of all three of these Actions and are in the process of documenting those settlements. Consequently, the parties respectfully take the view that the Court should extend the stay for thirty days, until Monday, August 31, 2020. The parties would likewise apprise the Court of their view on the stay a week before the expiration of the stay, on Monday, August 24, 2020, unless the Actions have earlier been dismissed.

The parties have consulted with the Department of Justice, which does not oppose the parties’ request. This is the fourth request for an extension of the November 30, 2018 stay, which was previously extended on June 10, 2019, November 5, 2019, and June 23, 2020, *see* ECF Nos. 263, 269, 275, 277, and no court appearances are currently scheduled. *See* Individual Rules of Practice, Rule 1.C.

We are available at the Court’s convenience to discuss this matter.

Respectfully submitted,

/s/ Amanda F. Davidoff
Amanda F. Davidoff
Counsel for Defendants

/s/ David E. Kovel
David E. Kovel
Counsel for Plaintiffs

cc: All counsel of record (via ECF)